

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA

CHARLOTTE DIVISION

DOCKET NO. 3:22-cv-00191

Kanautica Zayre-Brown,

Plaintiff,

vs.

The North Carolina Department of Public Safety, et al,

Defendant.

MOTION FOR ADMISSION
PRO HAC VICE
and AFFIDAVIT

NOW COMES Jaclyn A. Maffetore (“Local Counsel”), a member in good standing with the Bar with the United States District Court for the Western District of North Carolina (“WDNC”), and moves for the admission of Taylor Brown (“Applicant”), who seeks permission to represent Kanautica Zayre-Brown (Plaintiff)

_____ (“Client”) in this above-captioned case.

By signing this motion, Local Counsel and Applicant certify that:

1. Applicant is a member in good standing of the bar of the highest court of the State or of the District of Columbia where Applicant regularly practices law, which is New York _____.

2. Applicant practices under the name of or as a member of the following firm:

Firm Name: American Civil Liberties Union Foundation

Mailing Address: 125 Broad Street

City / State / Zip: New York, NY 10004

Telephone Number: 212-519-7887 **Facsimile Number:** 212-549-2650

Email Address (required): TBrown@aclu.org

3. Applicant certifies that s/he is also admitted to practice before and remains in good standing with the Courts in the following jurisdictions:

The New York State Court of Appeals; United States Court of Appeals for the 11th Circuit; and The United States District Court for the Southern District of New York.

4. Applicant certifies s/he has never been the subject of any formal suspension or disbarment proceedings; never been denied admission *pro hac vice* in this or any other jurisdiction or had *pro hac vice* admission revoked; never had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked; and has never received public discipline by any court or lawyer regulatory organization. If Applicant cannot so certify, the applicant has attached a separate explanation including particular information disclosing the disciplinary history or the denial of admission.

5. Applicant certifies that the client requested Applicant to represent it in this matter, along with Local Counsel.

6. Applicant agrees to be subject to the Orders of the WDNC, including the Local Rules of the WDNC, and amenable to the disciplinary action and the civil jurisdiction of the WDNC in all respects as if the applicant were a regularly admitted and licensed member of the Bar of this Court in good standing.

7. Local Counsel is satisfied that Applicant is qualified to practice before the Bar of the WDNC.

8. Local Counsel has conferred with counsel for the other parties, who have indicated they *do not* oppose this motion.

9. The required fee for admission *pro hac vice* is being submitted with the filing of this motion.

10. Applicant consents to electronic notification.

By signing this Motion, we so certify.

This, the 27 day of June, 2022.



Local Counsel



Applicant

Attorney Name Jaclyn A. Maffetore

Bar Number 50849

Firm Name ACLU of North Carolina Foundation

Firm Address P.O. Box 28004

Firm City / State / Zip Raleigh, NC 27611-8004

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